

# Code of Conduct



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## About us

### *Specialty pharma meets M&A competence*

CHEPLAPHARM is a European pharmaceutical company, headquartered in Greifswald, Germany. We offer our branded products globally.

It is CHEPLAPHARM's **VISION** to strengthen our position as a global player and to gradually expand our international footprint. Successful mergers and acquisitions on an international level are our basis for new value creation. CHEPLAPHARM is an expert in optimising synergy effects in order to realise and further develop our growth strategy. We acquire and sustainably integrate already marketed, but mature niche and legacy products into our portfolio. Close collaboration with our business partners along with the active and continuous life cycle management of our products are the major drivers behind the success of our portfolio. It is our **MISSION** to offer high-quality products so that our patients as well as our business partners and employees benefit from our success. We are dedicated to meeting our patients' demands in a responsible way. CHEPLAPHARM offers a well-diversified portfolio and serves numerous therapeutic areas and indications with prime quality products. This diversity allows us to respond to future business opportunities in various areas of indications with high interest and open-mindedness. It allows us to create an inspiring collaboration with our business partners with beneficial effects for both parties. Because our employees are our most precious resource, we constantly ensure an attractive working atmosphere that is based on motivation and respect.

### *Leveraging existing capabilities*

Since its foundation, CHEPLAPHARM has successfully pursued a buy and build strategy. We know how to leverage our capabilities which is proven by our long history of success and makes CHEPLAPHARM an attractive business partner. We developed and are now embedded in a global partner network, where we are respected as a capable, reliable and hands-on partner. We have comprehensive expertise in assessing divestment projects - ranging from single products to package deals. We are experienced in transferring the acquired products according to the respective local legislations as well as to market them in close cooperation with our distribution partners.

### *Collaboration, trust, experience*

CHEPLAPHARM is committed to provide branded products of high quality to patients. We emphasise sustainable product availability for all our customers. It is vital for us to foster a close and professional cooperation with our business partners. They can rely on our trustworthiness and on our way of doing business which is based on respect, tolerance and fairness. We are dedicated to fully integrate acquired products and to duly continue their business.

### *Who is addressed?*

This Code of Conduct applies to employees of CHEPLAPHARM and to employees of CHEPLAPHARM's affiliated companies. In addition, we expect our business partners to respect our commitment to compliance and make it their own.

### *How is this Code of Conduct to be used?*

Some situations are difficult to assess. The Code of Conduct helps to make decisions that are consistent with CHEPLAPHARM's corporate values.

In addition to the Code of Conduct, CHEPLAPHARM has laid down internal guidelines containing detailed rules of conduct for the individual areas covered by this Code of Conduct. These rules of conduct must always be observed.

### *Queries and messages*

In order to ensure that CHEPLAPHARM complies with legal rules and regulations as well as the rules we have set for ourselves, we must all be attentive and willing to point out possible breaches of the rules if there are concrete indications of such breaches.

Our greatest aim is to avoid damage to CHEPLAPHARM and its employees, as well as to our patients and business partners. To this end, we provide a system that allows employees to report violations of this Code of Conduct or of legal regulations or even suspicion of such violations. No one will suffer any disadvantage as a result of reporting a suspicion, unless the report was made maliciously or for unfair motives. It is irrelevant whether the suspicion turns out to be justified or not – CHEPLAPHARM considers it important to clarify unclear situations and to avoid even the impression of illegal or unethical behaviour. Examples include attempted bribery, fraud or violations of the Anti-Money Laundering Act (Geldwäschegesetz – GwG).

Employees can - at any time, confidentially and anonymously - provide information or get in touch with a person they trust. Your information and advice will then be passed on to persons who are obliged to maintain secrecy and guarantee confidential processing.

#### CHEPLAPHARM Compliance Officer:

Anna Rautenberg

E-Mail: [lc-compliance@cheplapharm.com](mailto:lc-compliance@cheplapharm.com)

Telephone: +49 3834 3914 140

Ms. Rautenberg is the internal person of trust and entrusted with the receipt of information on violations.

In addition to the internal person of trust, all employees have the option of contacting an external ombudsman under the same conditions of confidentiality.

### External ombudsman's office:

GÖRG Partnerschaft von Rechtsanwälten mbB  
Kantstr. 164, 10623 Berlin, Germany  
E-Mail: cheplapharm@goerg-dienstleistungen.de  
Telephone: +49 174 1960467

In addition to receiving information, the ombudsman's office also checks the plausibility of information and assesses the severity of the reported violation.

Information and advice on breaches of the rules should be presented in as much detail as possible. If you have sensitive documents that support or document a possible violation of the rules, please enclose them with your report. Similar to an emergency call, when reporting an incident you should have the following five questions (Who?/What?/When?/How?/Where?) in mind.

In general, the report is anonymous. However, even if you deliberately want to provide information by disclosing your identity, your identity will be kept confidential during all internal and extrajudicial steps of the procedure. When reporting, we ask you to give your consent to use your personal data so that we may comply with data protection requirements. In this context, we would also like to point out that, pursuant to Art. 14 (3) lit. a GDPR, the accused person must be informed of your identity as whistleblower no later than one month after the report.

The information and notices you provide will be treated in the strictest confidence by the competent bodies. Your evaluation is carried out only once and on a case-specific basis. The information is checked for plausibility and then classified according to the severity of the reported violation. After the investigation of the content of the notification has been completed, your data will be stored in a directory. You can find more information on this in our data protection regulations. If you report a complaint anonymously and without reference to your data, no personal data about you will be collected.

In individual cases, especially if it is essential to protect legitimate interests (e.g., in the case of indications of more than minor criminal offences), the obligation to maintain confidentiality before authorities or public bodies may be restricted.

Regardless of whom you contact: CHEPLAPHARM will follow up all information submitted via these communication channels comprehensively and confidentially.

Do you have any questions about our Code of Conduct? Then please contact our Compliance Officer or our management.

### *Sustainability, integrity and compliance*

The success of our company is based on integrity and the awareness of our social obligations. CHEPLAPHARM is committed to complying with all applicable laws and regulations. Violations of legal regulations or of this Code of Conduct can have negative consequences for the individual

employee and for CHEPLAPHARM. For this reason, violations will not be tolerated, but will be consistently pursued. To prevent violations, our employees familiarise themselves with the laws and regulations that apply to them and observe the relevant internal company guidelines.

## Patient safety

At CHEPLAPHARM, we are committed to patient safety. In particular, we help to ensure that our products are fit for their intended use and meet the appropriate level of safety, quality, efficacy and **performance**. We conduct manufacturing operations in compliance with the relevant regulatory requirements. CHEPLAPHARM requires its suppliers and partners to adhere to the same **high standards**. Also, CHEPLAPHARM oversees the supply chains and conducts audits to monitor compliance with these standards. Our employees involved in the lifecycle management of products are responsible for conducting work in compliance with all applicable procedures related to their job function. Moreover, our employees are encouraged to report complaints, adverse events or similar experiences with our medicinal products immediately via an **established reporting system**.

CHEPLAPHARM is committed to promoting appropriate **communication** with patients and patient groups. This includes the development of comprehensive prescribing information for patients and healthcare professionals and to monitor all our medicines for side effects. Upon becoming aware of some unknown side effects, we advise the appropriate authorities **and cooperate** with them in the action process. Furthermore, we take on the responsibility of keeping our patients safe by preempting and preventing unexpected and unintended events related to our products, e.g., by taking measures to minimise the risk of counterfeit drugs and by provision of tailored information if queried by patients, health professionals and others.

## Employment principles

CHEPLAPHARM offers an appreciative and motivating working environment. We promote **diversity, equal** opportunities and **tolerance**. We are fair and polite in our dealings with employees and business partners. Discrimination and bullying have no place in our company and are resolutely punished. CHEPLAPHARM is interested in providing long-term employment relationships to highly qualified personnel.

Occupational safety and health protection have priority at CHEPLAPHARM. We offer a safe and healthy working environment for all people at CHEPLAPHARM and for visitors in accordance with applicable laws and international standards. We define specific **safety goals** and make our employees aware of these goals. At the same time, our employees help to ensure a safe and healthy working environment by strictly observing occupational safety and health regulations.

At CHEPLAPHARM, a safe and healthy working environment is defined as a workplace which prevents and manages physical and psychological injuries, which is characterised by **cooperation**, based on **respect** and **trust**, and by individual and organizational competence in preventing and reducing work-related stress. The working environment supports our ambition to be an innovative, adaptable organisation with a high level of integrity.

## Respecting human rights

CHEPLAPHARM has committed itself to respecting and supporting the internationally proclaimed human rights and ensures to not be complicit in human rights abuses. CHEPLAPHARM also observes the prohibition of child labour, the freedom of association and the right of collective bargaining, the elimination of all forms of forced and compulsory labour and the statutory minimum wage requirements and expects the same from its business partners.

## Protection of privacy and personal data

We protect the privacy and personal data of our employees and our business partners and comply with the legal requirements regarding the treatment of personal data. Details on the handling of personal data are governed by the company's internal data protection guidelines.

Questions regarding the handling of personal data can be addressed to our data protection officer André Weinert ([datenschutz@cheplapharm.com](mailto:datenschutz@cheplapharm.com), +49 381 817082 284) at any time.

Questions about IT security are answered by our Head of the IT department Ricardo Kressin ([kressin@cheplapharm.com](mailto:kressin@cheplapharm.com), +49 3834 3914 170) or Uwe Stridde as team leader infrastructure and IT security ([uwe.stridde@cheplapharm.com](mailto:uwe.stridde@cheplapharm.com), +49 3834 3914 175).

## Protection of confidential information

CHEPLAPHARM protects confidential and sensitive information. This applies to information of the company as well as that of its employees and business partners.

The misuse or unauthorised disclosure of confidential and sensitive information can cause considerable damage, weaken the competitiveness of CHEPLAPHARM, give rise to recourse claims and damage the reputation of CHEPLAPHARM. In order to prevent this, our employees observe the relevant provisions in the company's internal guidelines.

## Protection of intellectual property rights

CHEPLAPHARM supports the establishment, maintenance, protection and defence of its intellectual property rights, in particular, its trademark rights. In doing so, CHEPLAPHARM maintains its competitive advantage.

At CHEPLAPHARM, we respect the intellectual property rights of other companies and expect other companies to respect our intellectual property. We do not engage in any kind of industrial espionage.

## Prevention of insider trading

It is prohibited to buy or sell financial instruments of CHEPLAPHARM or any other related company, while possessing non-public information regarding CHEPLAPHARM or any other related company likely to significantly affect the market value of these financial instruments.

## Compliance with global trade control laws

Many markets have laws that govern the import, export or transfer of certain products, items, software or technology. Furthermore, there are domestic controls in many countries to prevent spread and distribution of nuclear, chemical and biological weapons. Such controls may include export of certain biological materials, genetically modified organisms, chemicals, biomedical and chemical-handling equipment used in development or production of pharmaceuticals or transfer of information or technology abroad for manufacturing, testing or engineering purposes. CHEPLAPHARM complies with the applicable global trade control laws and reviews all activities involving restricted parties or restricted markets.

## Integrity, reliability and incorruptibility

Conflicts of interest may arise in day-to-day business where the interests of CHEPLAPHARM are not aligned with the personal interests of its employees. Conflicts of interest can arise, for example, from an interest in a competitor or business partner, from taking up a secondary occupation or from awarding a contract to close relatives. Any conflict of interest can give the appearance of inappropriate behaviour and thus weaken trust in CHEPLAPHARM.

It is CHEPLAPHARM's objective to **identify conflicts of interest** and take steps to eliminate them so that decisions can be made without bias in the spirit of CHEPLAPHARM. Any suspicion of a conflict of interest must therefore be reported immediately to the responsible superior.



Questions about conflicts of interest should be answered by the CHEPLAPHARM Compliance Officer or the responsible supervisor.

CHEPLAPHARM ensures **free and fair competition**. Our employees must comply with the relevant competition and antitrust laws and refrain from any unlawful conduct that could damage competition. This includes, among other things, price agreements restricting competition, market sharing and quantity agreements. Any suspicion of a breach of competition law must be reported immediately to the CHEPLAPHARM Compliance Officer.

CHEPLAPHARM fights all forms of corruption, observes the relevant anti-corruption guidelines and expects the same from its business partners. Our employees do not bribe in order to obtain contracts. This applies both to public officials as business partners, such as employees of public hospitals, and to private individuals in Germany and abroad.

CHEPLAPHARM must not offer or give money or anything else of value either as an inducement to make, or as a reward for making, any decision favourable to the interests of CHEPLAPHARM.

## Corporate Responsibility

By partnering with selected organisations, governments and foundations, CHEPLAPHARM works to find solutions that will have a sustained and meaningful impact on global health.

*In your everyday business activities, ask yourself:*

- ✓ Is the decision or action I am going to take in line with this Code of Conduct?
- ✓ Have I understood the risk and the possible implications of what I am doing?
- ✓ If necessary, have I sought advice to help me make an informed decision?
- ✓ Am I acting with integrity?
- ✓ Am I leading by example?
- ✓ Have I considered any potential impact on CHEPLAPHARM's reputation?
- ✓ How will I feel if the action I take today is featured in the newspapers or on television tomorrow?